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The chairman of the CSCN, Al Lewis of Teleglobe Canada, informed the NANPA that a working group was formed to develop the Canadian industry's position on the MCI request and that MCI had met with the working group to discuss the issue. The CSCN has informed the NANPA, in a November 10, 1992 letter (attached) of the Canadian position on this issue. Briefly, the Canadian position supports the need for international inbound carrier identification, but provides the Canadian rationale for not assigning a SAC for the purpose and for not implementing cross-border carrier identification within WZ1, pre-1995. The Canadian industry further recommends the assignment of an INPA instead of a SAC to meet the inbound-to-WZ1 international carrier identification need for all WZ1 international carriers.

Without the Canadian industry's ability to effect short-term cross-border network identification on calls to the US, the issue of intra-WZ1 cross-border network identification, in the opinion of the NANPA, is moot. Since the primary advantage of a SAC was to enable network identification on calls from Canada to the US and given the limited number of SACs available and the demand for them, the NANPA feels that it is inappropriate to allocate a SAC for short-term international network identification.

However, since:

1. the NANPA continues to support the need for international inbound network identification,
2. the NANPA is convinced that the need requires a pre-1995 resolution, and
3. MCI states that the only reason that an INPA is not feasible for international network identification is that it "will not work from other World Zone 1 countries to the U.S. until 1995",

the NANPA hereby informs MCI that it will assign an INPA, to be shared by WZ1 international carriers, for the purpose of inbound international carrier identification into WZ1. Furthermore, the NANPA will:

1. inform the WZ1 telecommunications industry, via a Bellcore Letter, of the assignment,
2. report the intent to make an assignment at the ICCF 27 meeting on November 18-19, 1992, and

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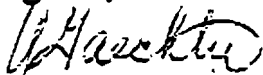
3. with the concurrence of MCI and any other WZ1 international carriers present, recommend that ICCF revise or replace Issue # 249 to reflect the assignment of an INPA instead of a SAC and the need for a Workshop to develop guidelines for the assignment of NXX codes within an INPA code to be shared by WZ1 international carriers.

The NANPA prefers not to assign NXX codes within the shared INPA until the assignment guidelines have been developed and have industry consensus. The NANPA will, however, consider assignments prior to guidelines development should it receive applications containing convincing statements of an "urgent need".

It should also be understood that the NANPA will not participate in bilateral business negotiations between the WZ1 international carriers and foreign administrations for the purpose of implementing the requisite business agreements necessary to perform 6-digit analysis prior to the December 31, 1996 date for Time "T". The NANPA will, however, at the request of the WZ1 international carriers, confirm, in an appropriate manner, to the foreign administrations that the assigned INPA is a legitimate code within WZ1.

We appreciate MCI's cooperation in providing the additional information requested by the NANPA and for its diligence in renewing the discussion of this issue. The NANPA sincerely hopes that although this response is not exactly what MCI requested, that it will meet the short-term needs of MCI and the other WZ1 international carriers.

Regards,



Fred Gaechter  
NANP Administration

Attachment

Copy to  
Peyton Wynns - FCC  
Gaston Dallaire - DOC  
Al Lewis - CSCN Chairman  
Madeline Bogdan - ICCF Moderator

ATTACHMENT B

GARY -

N00-PCS relationship

for



**McCaw Cellular  
Communications, Inc.**

August 18, 1992

Mr. R. R. Conners  
North American Numbering Plan Administration  
Bellcore  
290 West Mt. Pleasant Avenue  
Livingston, NJ 07039-0486

Dear Mr. Conners:

On behalf of McCaw Cellular Communications, Inc. ("McCaw"), I am writing to request expedited assignment of an N00 code for use by existing mobile personal communications services, including cellular. McCaw believes that there is an urgent need for the assignment of non-geographic numbers to cellular personal communications services.

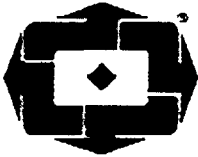
As you are aware, NANPA has stated that it will make available at least one, and possibly two, N00 codes for "personal telecommunications services" before the implementation of interchangeable NPAs in 1995. This commitment apparently was made in response to a request from AT&T for non-geographic numbers for use in connection with a "personal or mobility type of service."<sup>1</sup>

NANPA initially took the untenable position that these N00 codes would not be made available for mobility services already in existence. That position reflects NANPA's continued misunderstanding of the requirements of mobile services and its entrenched belief that cellular is purely a geographic service.<sup>2</sup> As McCaw has repeatedly explained to NANPA representatives, cellular is not a geographic-specific service. Moreover, cellular carriers have an urgent need for non-geographic codes for a variety of reasons and purposes, including: efficient routing of calls to roamers; effective implementation of nationwide wireless networks such as the North

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<sup>1</sup> Letter from Dennis K. Thovson, AT&T Corporate Standards Vice President, to R. R. Conners, dated December 17, 1991, at 1.

<sup>2</sup> McCaw informed NANPA last year of its need for non-geographic numbers, and NANPA advised it to wait for release of Bellcore's long-range numbering plan. McCaw did so, but when that plan was released, it continued to classify cellular as a geographic service ineligible for non-geographic codes.



Mr. R. R. Conners  
August 18, 1998  
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American Cellular Network ("NACN") and other seamless networks being planned by the industry; widespread introduction of Calling Party Pays and other new service offerings; and expansion of the existing subscriber base.<sup>3</sup> In addition, a non-geographic code would reduce the cost and time burden to cellular customers of having to have their phone physically reprogrammed as a result of NPA splits.

McCaw accordingly is formally requesting expedited assignment of an N00 code for use within World Zone 1 by existing mobile services, including cellular. This code should be made available no later than the date of assignment of an N00 code for other "personal telecommunications services," which we understand currently to be set for November, 1992. McCaw is ready to begin testing non-geographic numbers as soon as they are made available.

We request that NANPA move rapidly to meet the pressing needs of cellular carriers for non-geographic numbers. There are serious competitive issues raised by NANPA's initial response in the area of non-geographic numbers and McCaw expects NANPA to develop and administer impartial and equitable numbering policies for all communications services. Consequently, if NANPA does not agree to assign an N00 code for existing mobile personal communication services, but does assign one for non-cellular personal communications services, McCaw intends to pursue all available remedies at the FCC and elsewhere.

Given the urgency of this matter I also request that NANPA respond to this request no later than September 15, 1992. I look forward to your reply. In the meantime, please feel free to call me at (206) 828-8414 or Marsha D. Olch at (206) 828-8655 if you have any questions.

Very truly yours,

McCaw Cellular Communications, Inc.

Mark R. Hamilton  
Executive Vice President - External Affairs

cc Peyton L. Wynns (FCC)  
John Cimko, Jr. (FCC)

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<sup>3</sup> In some NPAs, such as 206, numbers are now so scarce that cellular carriers are unable to obtain NXX codes for new services like CPP.

ATTACHMENT C

**Bellcore**

Bell Communications Research

September 18, 1992

Mr. Mark R. Hamilton  
Executive Vice President - External Affairs  
McCaw Cellular Communications Inc.  
5400 Carillon Point  
Kirkland, Washington 98033-7397

Dear Mr. Hamilton,

Your August 18, 1992 letter requested "the expedited assignment of an N00 code for use within World Zone 1 by existing mobile services, including cellular." As administrator of the North American Numbering Plan (NANPA), based on recent industry discussions, we view this request in two contexts: 1. non-geographic numbering resources for personal communications services, and 2. non-geographic numbering resources for other mobile services, including cellular.

Numbering resources in the first context, i.e., personal communications services, are currently being discussed by the entire telecommunications industry in several fora, e.g., ICCF, T1P1, and TR45. These discussions were initiated by the NANPA after having proposed, in response to resource assignment requests from AT&T and Bell Atlantic Mobile Services and expressions of interest by others, to allocate up to two N00 codes for personal communications services and having recognized the need for consensus-derived assignment guidelines for NXX codes within the proposed N00 code(s). As you are aware, ICCF accepted the assignment guidelines issue as proposed by the NANPA and has formed a workshop to develop these guidelines. Additionally, the FCC is fully aware of the industrywide discussions now in progress.

During workshop discussion, a critical issue was identified - the availability of resources within the proposed personal communications N00 code(s) for both "personal mobility" and "terminal mobility." The ICCF workshop, at the recommendation of the NANPA representative, sent liaisons to T1P1 and TR45 requesting a definition for "terminal mobility" and "personal mobility" and their relationship to a "personal number." The result of these liaisons will be discussed at the next workshop meeting. The NANPA actively participated in both the ICCF workshop and T1P1 (as chairperson of the sub-working group on UPT numbering) discussions and through that participation achieved a better understanding of the "terminal mobility" issue.

This better understanding has resulted in a preliminary NANPA position on this issue that either 1. the first of the N00 codes proposed by NANPA for personal communications services should be shared by the providers of "personal mobility" and/or "terminal mobility", based on the eventual outcome of the definitions discussions, with the second proposed code being available for expansion if needed, or 2. one of the two proposed N00 codes be assigned to providers of "personal mobility" and the second to providers of "terminal mobility." Code efficiency, user recognition, and commonality of applications, cause the NANPA to strongly favor the first alternative.

It was the NANPA's original intention, although apparently misunderstood, that the ICCF effort to develop assignment guidelines for personal communications services (i.e., the

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entire range of personal mobility services, not just what is recognized within the telecommunications sector as "PCS") should include the method of allocating the resources within the two proposed N00 code(s) for both "personal mobility" and "terminal mobility." Absent such a combined effort, the NANPA will need to identify the appropriate method/industry forum for the development of assignment guidelines for "terminal mobility" applications and to clearly understand and define the difference, if any, between "terminal mobility" and other mobility services, such as cellular. It must be reinforced that the above views are only those of the NANPA, not the entire telecommunications sector. NANPA intends to present its recommendations for further discussion by the sector.

Numbering resources in the second context, i.e., for other mobile services, including cellular, must be addressed separately and, due to resource availability restrictions, in a different timeframe. It has been, and continues to be, the NANPA position that geographic NANP resources be assigned to providers of geographic services for the provisioning of geographic services and conversely that non-geographic NANP resources be assigned to the providers of non-geographic services for the provisioning of non-geographic services. The application of such a policy could allow an industry entity providing both geographic and non-geographic services to be assigned both categories of numbers for use in the provision of the related category of services.

Since the issue of the category of NANP resources, i.e., geographic and/or non-geographic, available to industry entities has been driven by the wireless sector, the NANPA has requested several times over approximately a two year period that the wireless sector, including cellular service providers, inform us of any consensus within that sector regarding the category(ies) of NANP resources appropriate for the wireless sector. Based on numerous discussions with representatives of the wireless sector, it is our understanding that such consensus does not currently exist. Absent this, the NANPA continued, in its proposal for the future of numbering in world Zone 1, to show wireless services, including cellular services, as provided by geographic numbers (the current procedure). Although the McCaw position, as stated in your letter, is clear, it does not constitute a consensus within the wireless sector, let alone the entire World Zone 1 telecommunications industry. Thus maintenance of the status quo is reasonable until consensus is evident, at least within the wireless sector itself. Such a consensus achieving effort could be coordinated, or at least refocused, by McCaw or discussed further in industry associations such as CTIA, Telocator, TIA, WIF, etc. NANPA would be a willing and active participant in any such discussions.

Even if industry consensus is achieved on the issue of geographic versus non-geographic code allocation, the major concern with the implementation of such an assignment policy, as always, is the availability of numbering resources. As McCaw is aware, the availability of NPA codes (geographic and non-geographic) is limited until post-1995. Consequently, this second issue must be considered and resolved within two timeframes - pre- and post-1995.

The post-1995 issue resolution will occur through the industry discussion and revision of the NANPA's proposal on the future of numbering in World Zone 1. The second iteration of that document will be distributed to the industry by January 1, 1993 and will reflect the above NANPA positions more clearly.

The pre-1995 issue is more difficult in that the NANPA must ensure that the few remaining NPA codes will meet both the geographic and non-geographic needs of the telecommunications sector until 1995. Hence a decision by the NANPA on your specific request for a World Zone 1 N00 code for existing mobile services, including cellular, can not be addressed for the pre-1995 period without a projection of the volume of numbers

required to meet the pre-1995 need. The NANPA therefore requests McCaw's assistance in obtaining such a wireless sector-wide projection.

The tone of McCaw's written communications with the NANPA is unfortunate, especially given our discussions in the past. It appears that this tone is based on a perception that NANPA has ignored the numbering needs of the wireless sector. We would be remiss if we did not attempt to dispel such a perception, both generally and in the specific context of the wireless sector.

NANPA deliberately strives for impartiality and fairness in its administration of NANP resources. In the context of a rapidly changing World Zone 1 industry, it is increasingly difficult for any entity, including NANPA, to completely understand all the global and numbering-specific ramifications of such changes. As the telecommunications sector collectively, and the NANPA individually, gains knowledge and understanding of these issues, policy and positions must be adjusted based on the newly gained knowledge and understanding. We have always responded, and commit to continue to respond, to every issue and request with a fair and impartial attitude based on current knowledge. It is our expectation that participants within the telecommunications sector will treat the issues surrounding the NANP resource with the same fairness and impartiality and that knowledge and understanding will be shared in a cooperative, non-confrontational manner. Such a cooperative effort will assist in the success of the aggregate World Zone 1 industry while the lack of such an effort can only be detrimental to the World Zone 1 industry in an increasingly competitive world market.

In the specific context of numbering resources for the wireless sector, NANPA has sought input and a consensus position from the aggregate wireless sector on numerous occasions. NANPA was instrumental in Telocator's efforts to present the wireless sector's numbering needs to ICCF. Based on productive discussion at several meetings, ICCF accepted Telocator's issue. It is our understanding that the issue was closed as unresolved when Telocator stopped attending the meetings reportedly due to a lack of consensus among its membership regarding the most appropriate numbering resources for the wireless sector. NANPA has also actively participated in, presented its views to, and sought input from TR45 and WIF meetings. NANPA presented an overview of its proposal on the future of numbering in World Zone 1 to the WIF and received no comments during or after the presentation. NANPA has visited with McCaw at its Kirkland location at least twice and although McCaw's position on numbering needs for the wireless sector were clear during these meetings, they appropriately were not offered as the consensus position of the wireless sector. NANPA has actively sought, and continues to seek, a consensus position on the appropriate numbering resources for the wireless sector and therefore takes exception with the tone of McCaw's letter. McCaw's assistance in the effort to achieve consensus within the wireless industry would, as always, be appreciated.

We look forward to working cooperatively with McCaw on this issue and all numbering issues in the future.

Regards,



Fred Gaechter

cc: Peyton L. Wynns - FCC  
John Cimko, Jr. - FCC